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NASA Procedural Requirements

COMPLIANCE IS MANDATORY

NPR 1400.1E

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Request Notification of Change

(NASA Only)

Subject: NASA Directives and Charters Procedural Requirements

Responsible Office: Office of Internal Controls and Management Systems

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Appendix F. Sample Cost/Benefit Impacts

F.1 Impact to Headquarters Responsible Offices (Offices that write Agency-level directives):

a. This NPR will require Responsible Offices to include projected cost/benefit impacts for offices and Centers to implement new requirements. Therefore, the cost to implement this requirement involves additional staff time for Responsible Offices' writers to:

(1) Project cost/benefit impacts.

(2) Disposition comments on cost/benefit impacts provided by reviewing offices and Centers.

(3) Formulate a consolidation of cost/benefit impacts to be included in directives' executive summaries when packages are submitted for approval. The benefit of implementing this requirement will allow the Agency to determine if requirements dictated in new and/or revised Agency-level directives can be accomplished with existing resources or if additional resources will be needed, thereby identifying potential unfunded mandates.

b. This NPR will require Responsible Offices to properly convey requirements to contractors by delineating between requirements and procedures that are directed toward civil service employees and requirements that are directed toward contractors. The cost to implement this requirement will require additional staff time for directive writers to delineate requirements. The benefit of implementing this requirement will allow Agency-level directives to convey requirements for civil service employees, as well as contractors, thereby allowing requirements for contractors to be lifted from directives and

inserted into contracts, with the exception of voluminous requirements that will require sections of directives to be cited in contracts.

c. This NPR will require Responsible Offices to use new requirements for issuing NASA charters. There are no additional costs (e.g., financial, human resources, technical) to implement this requirement because process steps are already in place. However, the benefit of implementing this requirement will establish an official internal control for publishing charters for councils, boards, and committees not covered in NPD 1000.3, The NASA Organization.

d. This NPR will require Responsible Offices to list applicable forms that directly relate, and are necessary, to the performance of the activities specified in the directive. There are no costs to implement this requirement, and the benefit of implementing it reduces the number of uncontrolled forms in existence and ensures that forms supporting NASA directives are created in accordance with established procedures.

e. This NPR will require Responsible Offices to properly format citations in NASA directives. There are no costs to implement this requirement, and the benefit to implementing it will provide directives writers with requirements needed to ensure formatting consistency in all NASA directives.

f. This NPR will require Responsible Offices to coordinate NPDs in 90 calendar days and NPRs in 120 calendar days. There are no costs to implement this requirement, but the benefit provides an increase in the number of days to conduct a thorough review/comment, disposition, and final approval of Agency-level directives.

Note: This NPR does not require an immediate, complete rewrite of all NASA directives.

F.2 Impact to Reviewing Offices (Headquarters and Centers):

This NPR will require reviewing offices to review, comment, and concur on both the technical content in Agency-level directives and on cost/benefit impacts projected by the Responsible Office to implement new requirements. The cost to implement this requirement will require additional staff time on the part of the reviewing offices' subject experts, particularly the Centers, to comment on projected cost/benefit impacts. The benefit of implementing this requirement enables reviewing offices and Centers to comment on projected cost/benefit impacts prior to directives being approved.

F.3 Impact to DMs (Headquarters and Centers):

a. This NPR will require DMs to ensure that:

(1) Writers of Agency-level directives project cost/benefit impacts to implement new requirements within HQ Offices and Centers.

(2) Reviewers of Agency-level directives comment on projected cost/benefit impacts, as well as the content in directives.

(3) Agency-level directives are reviewed for quality.

b. While there are no costs to implement these requirements, a slight adjustment to DMs' internal process will be necessary. The benefits of implementing these requirements provides for an effective and efficient way to collect and collaborate cost/benefits impacts

and improves the writing quality of Agency-level directives.

F.4 Impact to Centers:

This NPR will require Center-level directives writers to add a standardized applicability statement for use of the terms: shall, may, can, should, will, are, and is. There are no additional costs (e.g., financial, human resources, technical) to implement this requirement. The benefit of implementing this requirement ensures that Center-level directives follow requirements for content and structure, making these documents consistent with Agency-level directives.

Note: This NPR will require rewrite of existing Center-level directives when they are revised.

F.5 Impact to Agency and Center Contracting Officer Technical Representatives (COTR) (Headquarters and Centers):

This NPR recommends that requirements in NASA directives that apply to contractors, grantees, and parties to agreements be clearly delineated in the directives themselves, or that the applicable directives' requirements for contractors be included in contracts, grants, or agreements. When the directive itself does not specify which requirements apply to contractors, grantees, or parties to the agreement, then additional staff time on the part of the COTR required to include specific requirements in the contract, grant, or agreement will be necessary. The benefit of implementing this recommendation initiates a best practice that will allow requirements for contractors, grantees, and parties to agreements to be clearly identified in contracts, grants, and agreements and avoid misunderstanding and misinterpretation of requirements which may impact cost, schedule, or performance.

Note: This NPR does not require modifications to existing contracts, grants, or agreements.

F.6 Impact to the Office of Internal Controls and Management Systems (OICMS):

a. This NPR will require OICMS to make technical adjustments in NODIS to:

- (1) Develop a comment and disposition field for cost/benefit impacts as a separate entry for reviewing offices and Centers.
- (2) Increase the number of days to coordinate Agency-level directives from 60 to 90 calendar days for NPDS and from 90 to 120 calendar days for NPRs in order to allow a sufficient number of days for Responsible Offices and Reviewing offices and Centers to collaboratively develop thorough cost/benefit impacts.

b. There are no costs to make technical adjustments in NODIS. The benefits of making these adjustments enables the system to be ready to effectively and efficiently collect costs/benefit impact information entered in NODIS by the Responsible Offices and the reviewing offices.

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